

# EXHIBIT 39

**In the Matter Of:**

Fair Fight vs Raffensperger

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**30(b)(6) Matthew Laney**

*October 23, 2019*

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3200 COBB GALLERIA PARKWAY  
SUITE 265  
ATLANTA, GA 30339

Fair Fight vs Raffensperger

30(b)(6) Matthew Laney

10/23/2019

1 MR. KASTORF: -- objection to form.

2 MR. DENTON: Yeah, I just didn't --  
3 okay. Okay.

4 BY MR. DENTON:

5 Q. You can answer the question if you --

6 MR. DENTON: Would you mind reading  
7 it back?

8 (Whereupon, the record was read by  
9 the court reporter as follows:

10 Q "Do you believe defendants  
11 intended to discriminate against voters  
12 on the basis of race?")

13 THE WITNESS: I believe I already  
14 answered that question. I -- it's  
15 impossible for me to know what anyone's  
16 intentions are.

17 But I think the actions are certainly  
18 in line with Georgia's history of  
19 discrimination and frustrating voters  
20 getting to the polls, particularly among  
21 communities of color.

22 BY MR. DENTON:

23 Q. Have you provided documents to the  
24 Internal Revenue Service describing the purpose of  
25 the church?